

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF PUERTO RICO

IN RE:

MAGALI FEBLES MORETA
D/B/A MAGALI FEBLES SALON

CASE NO. 09-08760(BKT)

DEBTOR

CHAPTER 11

DEBTOR'S OPPOSITION TO MOTION REQUESTING DISMISSAL FILED BY
CREDITOR ALOMA
AND
DEBTOR'S REQUEST FOR AN EXTENSION TO FILE THE DISCLOSURE
STATEMENT AND REORGANIZATION PLAN IN COMPLIANCE WITH
DOCKET ENTRY 72

TO THE HONORABLE COURT:

COMES NOW, Debtor, Magaly Febles Moreta, by the undersigned attorney, to respectfully state and pray:

1. Debtor filed this petition for relief under Chapter 11 of the Bankruptcy Code on October 15th, 2009.
2. On this date, creditor Aloma filed Motion Requesting Order of Dismissal of the above captioned case. Debtor opposes said request and herein files a request for an extension of time to file the Disclosure Statement and Plan in this case in compliance with docket entry 72.
3. A Status Report hearing was held on January 8th, 2010. Debtor informed the Court it is a "Small Business Debtor", as identified in section 101(51 C and D) of the Bankruptcy Code. During that hearing, Debtor conveyed the intention to file the Disclosure Statement and the Reorganization Plan by March 30th, 2010.

4. Notwithstanding all efforts undertaken, Debtor deems an extension of time is essential to comply with the Bankruptcy Code statutory requirements of a comprehensive Disclosure Statement and Chapter 11 Reorganization Plan.

5. In fact, Debtor is in the process of concluding the projections; in addition to obtaining and compiling essential accounting information to complete the Disclosure Statement and Plan.

6. Debtor is also completing the assessment of all claims filed in this case in order to determine if objections will be filed. The evaluation of claims is a team effort conducted by Debtor, Debtor's attorney and Debtor's accountant. This process must be executed prior to approving the Disclosure Statement and confirming the Reorganization Plan; certainly, the evaluation of all claims filed in this case, furthers the reorganization process of the Debtor.

7. Debtor respectfully requests a forty-five day extension to comply with the aspects discussed in this motion; given that they are crucial to file a comprehensive Disclosure Statement and Plan. This term will elapse on June 15th, 2010.

WHEREFORE, Debtor respectfully prays for this Honorable Court to:

- 1) Deny creditor Aloma's Motion Requesting Dismissal filed on May 12, 2010 and
- 2) To grant Debtor a 45 day extension to comply with the aspects discussed in this motion and file a comprehensive Disclosure Statement and Plan on or before June 15, 2010.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY: that on this date, I electronically filed this motion with the Clerk of the Court using the CM/ECF System which will send notice of this filing to all registered participants.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico this 12 day of May 2010.

s/ M^a Mercedes Figueroa y Morgade

M^a Mercedes Figueroa y Morgade

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